

201-15942



Lisa Medley/DC/USEPA/US

07/15/2005 08:17 AM

To NCIC HPV@EPA

cc

bcc

Subject Fw: HPV Challenge Commitment Letter

----- Forwarded by Lisa Medley/DC/USEPA/US on 07/15/2005 08:17 AM -----



Kate Donnelly

<Kate.Donnelly@unilever.com>

m>

Sent by:

Kate.Donnelly@unilever.com

m

To NCIC OPPT@EPA, "chemrtk@epa.gov"

<chemrtk@epamail.epa.gov>

cc "Mallon, David" <David.Mallon@unilever.com>

"Gallagher, Peter" <Peter.Gallagher@unilever.com>

Subject HPV Challenge Commitment Letter

07/14/2005 10:07 AM

2005 JUL 18 AM 11:27
RECEIVED
OPPT OFF

Attached, please find Unilever's commitment letter for HPV sponsorship of CAS#61789-32-0.

Kate Donnelly
Sr. Counsel - Environmental
Unilever United States, Inc.

700 Sylvan Avenue
Englewood Cliffs, New Jersey 07632-3100
Tel: 201-894-2773
Fax: 201-894-2727
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Click here and check out the Law Department's Intranet Site

<http://uslaw.unilever.com>

At the site, you can request a contract online and find out about breaking legal news that will impact your business.

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Unilever HPV Commitment.PDF

201-15962



Unilever Home & Personal Care
40 Merritt Blvd, Trumbull, CT 06611

July 6, 2005

VIA E-MAIL & CERTIFIED MAIL—
RETURN RECEIPT REQUESTED

Stephen L. Johnson, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attn: HPV Chemical Challenge Program, AR-201
oppt.ncic@epa.gov; chem.rtk@epa.gov

RECEIVED
OPPT/CEIC
2005 JUL 18 AM 11:27

RE: HPV Sponsorship of CAS #61789-32-0

Dear Administrator Johnson,

Conopco, Inc., which is registered to do business as "Unilever" or "Unilever Home & Personal Care North America," wishes to sponsor CAS #61789-32-0 (Fatty acids, coco, 2-sulfoethyl esters, sodium salts) in the U.S. Environmental Protection Agency's High Production Volume (HPV) Chemical Challenge Program.

We intend to submit a test plan and robust summaries by December 31, 2005. We understand the information and data we provide under the HPV Challenge Program will be made publicly available. You should note that Unilever uses this chemical exclusively in the manufacture of products that are already regulated by the FDA, and thereby exempt from TSCA. However, in the spirit of the Challenge Program, the Unilever maintains that it is everyone's best interest to share available data.

We recognize that sponsorship entails assembling and reviewing available test data, developing and providing test plans for this chemical, and conducting additional testing, if necessary. It is our intention to start any additional testing in 2006 and complete it within 24 months of this commitment.

Our technical contact is:

David Mallon
Unilever HPC
40 Merritt Blvd
Trumbull, CT 06611
203-381-4268
David.Mallon@unilever.com

Please do not hesitate to contact us if you have any questions.

Sincerely,

Peter Gallagher,
Vice President RTC, NA